

Options for Renegotiation of PEP Tasks
DRAFT – For PEP Implementation Team Consideration - DRAFT
February 2006

Background

The Program Enhancement Plan (PEP) was implemented beginning November 1, 2004 and must be completed by October 31, 2006. The PEP includes 20 action steps with over 100 benchmark tasks. To be found in conformance by the federal Administration for Children and Families (ACF), Wisconsin must complete all of the action steps and the benchmark tasks by the end of the 8th quarter of the PEP.

Through progress reports on the first 4 quarters of the PEP, the Division of Children and Family Services (DCFS) has made adjustments to many of the benchmark tasks, clarifying the task or changing the due date to reflect action on the task. Minor changes to tasks have been approved by ACF through the quarterly progress reports. The PEP Matrix showing all of the tasks has been updated with each quarterly progress report, and is available on the DHFS website at <http://dhfs.wisconsin.gov/cwreview/PEP.htm>

Renegotiation of PEP Tasks

The ACF process for state improvement plans allows states to renegotiate major changes to their improvement plan at the mid-way point of the plan. A major change includes deleting a benchmark task or extending the completion date beyond the 8th quarter. In January 2006, ACF staff visited Wisconsin to review state progress on PEP implementation. During the site visit, ACF staff indicated they will consider a request from Wisconsin to revise tasks in the PEP, acknowledging the number of tasks in the PEP and local agency concerns about the workload associated with implementation. DCFS has already proposed and received approval to delay revision of the Ongoing Service Standards (Tasks J.1a and N.2). The items for renegotiation must be submitted by mid-March 2006.

ACF staff indicated that tasks related to safety are a high priority and tasks related to systemic factors must be completed.

Tasks related to permanency and well-being can be renegotiated, provided Wisconsin remains committed to achieving the PEP goals by including the tasks in the child welfare state plan (Child and Family Services Plan). The current state plan covers the period of 2005 – 2009, so tasks not completed by October 31, 2006 as part of the PEP period, must be addressed in the 2007-2009 period. With the next Child and Family Services Review in Wisconsin taking place in 2008, it is recommended that most of the deferred tasks be completed in 2007. The following table lists specific PEP benchmark tasks that could be moved out of the PEP period.

Quarter 6 = February – April 2006

Quarter 7 = May – July 2006

Quarter 8 = August – October 2006

PEP Item	Current Due Date	Tentative New Date of Implementation	County Workload Implications (significant, medium, low)	Comments
CPS Case Findings (A.2) – Update policy for making substantiation findings for abuse and neglect reports.	Issue policy Q6 eWiSACWIS changes Q7	<i>June 2007</i>	Medium – Significant	The Case Finding memo will be included into an integrated revision of the entire CPS Investigation Standards (Primary, Secondary and Non-caregiver).
Trial Home Visits (C.1b) – Issue policy on trial home visits for children in out-of-home placement.	Issue policy Q6 Training Q7	<i>Issue in PEP Quarter 8</i> <i>Effective date January 2007</i>	Medium	eWiSACWIS changes will be necessary and should be available in the December 2006 release. Training and technical assistance will be provided in November and December 2006 (prior to policy going into effect).
Combined Foster/Adoptive Family Assessment (D.5) – Create combined assessment for state adoption use and optional local agency use.	Select assessment Q7 eWiSACWIS changes Q8	<i>Select assessment tool in Q8</i> <i>eWiSACWIS changes in March 2007</i>	Low	Selection of the combined assessment tool will take longer and eWiSACWIS changes cannot be made until the selection is made. A final decision still needs to be made on whether or not counties will use the combined assessment.
Child Limit in HFS 56 (E.3) – Increase limit for siblings that can be placed together in the same foster home.	Complete rule changes for internal review in Q8	<i>Issue July 2007</i>	Low	HFS 56 rule change will be packaged with rule change for K.5.
ICWA Policy Requirements	DCFS Memo	<i>PEP Quarter 8 or</i>	Medium	This requires changes to Wisconsin

Quarter 6 = February – April 2006

Quarter 7 = May – July 2006

Quarter 8 = August – October 2006

PEP Item	Current Due Date	Tentative New Date of Implementation	County Workload Implications (significant, medium, low)	Comments
(G.1a) – Clarify requirements to improve ICWA compliance.	Q6	<i>September 2007</i>		statute, which may not occur in 2006. Legislation could be pursued in 2007. Issuing the memo should wait for the legislation.
Family Engagement (H.1) – Issue policy providing direction and tools for workers to use to enhance the identification and engagement of family members.	Issue policy Q6 Training Q7	<i>January 2007</i>	Medium	Currently this item is being proposed as a resource guide, in combination with Action Step I, to be issued by informational memo. It would not establish any new requirements.
Sharing Information with Relatives (H.2) – Issue memo on sharing information with relatives for placements.	DCFS Memo Q6	<i>PEP Quarter 7</i>	Low	Currently, legislation is pending(SB 284) that will address this item. The memo will be issued after legislative action is complete.
Relative Safety Assessment (H.3) – Assist agencies to use safety assessments with relative placements.	Technical assistance Q7	<i>June 2007</i>	Medium	Assessing the safety of licensed and unlicensed out-of-home care providers is already a part of the Safety Intervention Standards. The next steps include further guidance in this area as well as making changes in eWiSACWIS to support case practice.
Non-custodial Parent Involvement (I.1) – Improve efforts to locate and involve non-custodial parents.	Policy Review Q6 KIDS access Q7 Training Q8	<i>Complete policy review and KIDS access as identified in PEP</i>	Low	Currently, this item is being proposed as a resource guide, in combination with Action Step H, to be issued by informational memo. It would not establish any new requirements.

Quarter 6 = February – April 2006

Quarter 7 = May – July 2006

Quarter 8 = August – October 2006

PEP Item	Current Due Date	Tentative New Date of Implementation	County Workload Implications (significant, medium, low)	Comments
		<i>Training in January 2007</i>		
Foster Parent Training (K.4b) – Define statewide pre-service and ongoing training requirements for foster parents based upon competencies and identify curriculum.	Define requirements Q7 Revisions to numbered memo Q8	<i>Issue memo January 2007</i> <i>Training of trainers on new curriculum and effective date of pass-through funding changes July – September 2007</i> <i>Agencies submit training plans in accordance with revised memo November – December 2007</i>	Medium	This item requires the Training Council to approve committee recommendations to define training requirements. The memo on pass through funding for foster parent training will be modified to reflect the Training Council recommendations. If the Training Council endorses mandating foster parent training, an administrative rule change would be necessary. The change to HFS 56 would be packaged with E.3 and K.5.
Foster Parent Handbook (K.5a) – Develop handbook for local agencies to use with foster parents and communicate requirement for development of local handbooks.	Handbook Q7	<i>Coincide with the issuance of HFS 56 – July 2007</i>	Low	The creation of a foster parent handbook is new to some agencies, but others will only need to review their existing handbook and make alterations as necessary. Moving the implementation of this item will

Quarter 6 = February – April 2006

Quarter 7 = May – July 2006

Quarter 8 = August – October 2006

PEP Item	Current Due Date	Tentative New Date of Implementation	County Workload Implications (significant, medium, low)	Comments
				allow agencies more time to develop and provide training on the handbook.
Revisions to Administrative Rule (K.5c) – Incorporate use of foster parent handbook into rules for private licensing agencies.	Seek rule changes Q7	<i>HFS 56 issuance – July 2007</i>	Low	Changes to HFS 56 will also include the development of a foster parent handbook.
Managed Care Findings (L.1c, L.2) – Analyze results of Milwaukee managed care project using Medicaid data and child welfare case reviews.	Present preliminary results Q8 Limited case review Q8	<i>Preliminary results and limited case review July 2007</i>	Medium (Milwaukee only)	Program will begin implementation in 2006 and a longer period is needed for evaluation.
Mental Health Screening (M.1) – Pilot mental health screening tool for child welfare workers and develop policy on mental health screening.	County pilots Q6 Develop policy Q7 eWiSACWIS changes Q8	<i>Proceed with pilots as identified in the PEP (and ongoing through June 30, 2007)</i> <i>Assessment, treatment and policy development August 2007</i> <i>eWiSACWIS changes December 2007</i>	Significant	The county pilots will proceed in 2006, and at least one year should be allowed prior to data analysis. Policy development will be deferred until after the data analysis is completed. Including mental health screening tools in eWiSACWIS will depend on the policy implementation. Statewide implementation would take place in CY 2008.

Quarter 6 = February – April 2006

Quarter 7 = May – July 2006

Quarter 8 = August – October 2006

PEP Item	Current Due Date	Tentative New Date of Implementation	County Workload Implications (significant, medium, low)	Comments
HFS 44 Permanency Planning Rule (N.1) – Issue administrative rule on reasonable efforts and permanency planning.	Issue rule Q8	<i>Effective June 2007</i>	Significant	Promulgation of the rule will take longer and eWiSACWIS changes may be necessary. Training will be needed for implementation.
QSR Case Review Model (Q.3.9) – Automate case review tool in eWiSACWIS for counties to use for local QA purposes.	Automate in Q8	<i>December 2007</i>	Low	Automation of the tool will be deferred to allow more experience with the case review tool.
Child Welfare Training Rule (R.1c) – Issue administrative rule on child welfare staff training requirements.	Issue rule Q7	<i>PEP Quarter 8</i>	Significant	Promulgation of the rule will take longer.
Social Work Curriculum (R.2) – Create an ad hoc committee to meet with the Schools of Social Work to establish a match between current academic curriculum and Training Partnership foundation training.	Q6	<i>October 2007</i>	Low	This item is a long-term process that will entail in depth discussions and work with the Universities to incorporate foundation and ICWA training content into Child Welfare Social Work curriculum.